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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFREY JOHN CHURCH,

Defendant.

CR 03-430-KI

**JOINT MOTION TO CONTINUE
SUPERVISED RELEASE HEARING**

The parties, through counsel for Jeffrey Church, move this Court to continue the scheduled supervised release hearing date of May 13, 2008, to June 13, 2008, or a date thereafter convenient to the Court. Assistant United States Attorney Greg Nyhus joins in this request.

Mr. Church has been charged with several supervised release violations including an allegation that he absconded to Thailand. It is the government's understanding that authorities in Thailand will seek to have defendant extradited to face the pending charges.

Due to the international and complicated nature of this matter, and remaining uncertainty regarding the collateral consequences of a supervised release disposition at this time, the parties request additional time for both the government and defense counsel to prepare appropriately for

court. In a conference between counsel on May 16, 2008, the parties realized that the status of Mr. Church's legal situation was unsettled by international and domestic authorities. Counsel for both the government and defense would request a continuance until a time no earlier than the week of June 16, 2008.

Although it refers to a speedy trial right rather than the right to a prompt disposition of a supervised release violation, the parties agree that the criteria permitting delay in Title 18, United States Code, Section 3161(h)(8)(A) are satisfied. A continuance is appropriate as the ends of justice served by taking such a delay and outweigh the interest of the public and the defendant in a speedy disposition. Mr. Church is detained at the Multnomah County Jail at Inverness. He has been advised of the need for the continuance and has authorized counsel to represent he has no objection to the continuance.

RESPECTFULLY SUBMITTED this May 16, 2008.

/s/ Alison M. Clark

Alison M. Clark
Attorney for Defendant